

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Reading)**

<b>IN RE:</b>	:	
<b>JOHN THOMAS KEENAN</b>	:	<b>BK. No. 19-13220-pmm</b>
<b>Debtor</b>	:	
	:	<b>Chapter No. 13</b>
<b>FREEDOM MORTGAGE CORPORATION</b>	:	
<b>Movant</b>	:	
<b>v.</b>	:	
<b>JOHN THOMAS KEENAN</b>	:	
<b>SHARON K. KEENAN (Non-filing Co-Debtor)</b>	:	<b>11 U.S.C. §362 AND §1301</b>
<b>Respondents</b>	:	

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

**FREEDOM MORTGAGE CORPORATION** has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to permit **FREEDOM MORTGAGE CORPORATION** to Foreclose on **5177 FOXCROFT DRIVE, SCHNECKSVILLE, PA 18078**.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before 04/29/2020 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

U.S. Bankruptcy Court  
Office of the Clerk, Room 103  
The Gateway Building  
201 Penn Street  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

PHELAN HALLINAN DIAMOND & JONES, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable PATRICIA M. MAYER on 05/19/2020 at 10:00 a.m., in the United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Courtroom 4th Floor, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Moving party hereby consents to a 90 day extension of the 30 day hearing date required under 11 U.S.C. Section 362 (e).

April 7, 2020